STATE OF WISCONSIN WISCONSIN ELECTION COMMISSION

DOUGLAS HYANT, Political Director, Assembly Democratic Campaign Committee,

Complainant,

Against

AHNA KEY,

Respondent.

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VERIFIED COMPLAINT

- I, Douglas Hyant, upon information, personal knowledge, and belief, hereby allege and swear as follows:
- 1. This Complaint is brought against Ahna Key pursuant to Wis. Admn. Code EL § 2.07, Wis. Stat. § 8.15(2), Wis. Stat. § 8.15(3), and Wis. Stat. § 8.15(4)(a).
- 2. I am a qualified elector in and resident of the State of Wisconsin. I am the Executive Director of the Assembly Democratic Campaign Committee, with offices located at 15 North Pinckney Street, Suite 200 in the City of Madison, Wisconsin, Zip Code 53703.
- 3. The Respondent, Ahna Key, Wisconsin Elections Commission File Number 0105980, Receipt Number 295, maintains a residential address at 205 North Michigan Street, in the City of Prairie Du Chien, Wisconsin, Zip Code 53821.
- 4. On or about June 1, 2018, Respondent filed nomination papers with the Wisconsin Elections Commission to be placed on the November 6, 2018 ballot for State Representative in the 96th Assembly District. The Respondent's nomination papers contained

approximately 186 signatures as determined by initial review of the Wisconsin Elections Commission staff.

- 5. Upon a more detailed examination, Respondent's nomination papers contain numerous deficiencies, including but not limited to: signers who are not qualified electors due to felony convictions, electors who signed the petitioner's papers multiple times, and/or signers who did not provide their address and municipality information in the certification.
- 6. Respondent's nomination papers contained a total of five (5) signatures with insufficiencies pursuant to Wis. Admn. Code EL §§ 2.05 and 2.07, bringing the total number of valid signatures substantially below the 200 signature threshold required to be placed on the ballot for State Assembly.

I. ELECTOR(S) SIGNED THE PETITIONER'S NOMINATION PAPERS MULTIPLE TIMES

- 7. For nomination signatures to be valid pursuant to Wis. Stat. § 8.15(2), the signing elector must not have previously signed the nomination papers for the same candidate running for the same state office. Wis. Stat. § 8.15(2) (2015-16).
- 8. Pages 7 and 19 of Respondent's nomination papers include signature(s) from electors who previously signed nomination papers for the same candidate running for the same seat (i.e., duplicate signatures). This is a clear violation of Wis. Stat. § 8.15(2). Signature matches at issue are as follows: Page 7-9 and Page 19-4 (1 signature eliminated from Respondent's nomination papers).
- 9. Copies of the Respondent's nomination papers exhibiting this defect and the matching duplicate signatures from the Respondent's nomination papers are attached hereto and incorporated herein as "Exhibit A". In particular, one signatory, Jean Powers, signed the Respondent's nomination papers two (2) times, using one address, which was duplicated. A

comparison of the signatures clearly shows that both are the same individual. (See Signatures 7-9, 19-4).

II. SIGNERS WERE NOT QUALIFIED ELECTORS DUE TO FELONY CONVICTIONS

- 10. For nomination signatures to be valid, the signer must be a qualified elector in the district. Individuals who have been convicted of a felony and are currently serving any portion of their sentence, including extended supervision, probation, or parole, are not eligible to vote, and therefore are not electors qualified to sign nomination papers. *See* Wis. Stat. § 6.03(1)(b) (2015-16).
- 11. Pages 7 and 14 of Respondent's nomination papers includes two (2) signatures from electors disqualified due to a felony conviction, as confirmed via a CCAP search, *available* at wcca.wicourts.gov. Respondent's nomination signatures exhibiting this defect are located at Page 7 2 and 14-8 (2 additional signatures eliminated from Respondent's nomination papers).
- 12. Copies of the Respondent's nomination papers exhibiting this defect are attached hereto and incorporated herein as "Exhibit B". Screenshots of the CCAP records for each disqualified signatory are attached hereto and incorporated herein as "Exhibit C".

III. ELECTOR DID NOT PROVIDE REQUIRED ADDRESS AND MUNICIPALITY OF RESIDENCE

- 13. For nomination signatures to be valid pursuant to Wis. Stat. § 8.15(2), an elector signing the nomination papers for a state office, including that of Representative in the Wisconsin State Assembly, must provide their address and municipality of residence for voting purposes. Wis. Stat. § 8.15(2) (2015-16).
- 14. Page 14 of Respondent's nomination papers fail to correctly identify the address and/or municipality of residence of the Elector. This is a clear violation of Wis. Stat. § 8.15(2).

- 15. Copies of the Respondent's nomination papers exhibiting this defect are attached hereto and incorporated herein as "Exhibit D". Signatures exhibiting this defect are as follows: Page 14-8, 9 and 10 (3 additional signatures eliminated from Respondent's nomination papers).
- 16. Respondent's nomination papers contained a total of 5 signatures with insufficiencies pursuant to Wis. Admn. Code EL §§ 2.05-2.07 and Wis. Stat. § 8.15, *et. seq.*, bringing the total number of valid signatures below the threshold of 200 signatures necessary to be placed on the ballot for State Assembly. The contested signatures are contained in the above-referenced exhibits, accompanied by a detailed explanation of their insufficiency.
- 17. Complainant respectfully submits that the foregoing facts warrant the Commission's attention, and the Commission should take prompt action to eliminate from the nomination papers filed by Respondent all pages that are insufficient or do not comply with Wis. Admn. Code EL §§ 2.05 2.07.
- 18. Complainant reserves the right to amend this complaint with additional information.

SIGNATURE AND CERTIFICATION

I, Douglas Hyant, being duly sworn under o complaint and that the above listed allegations are t	- · · · · · · · · · · · · · · · · · · ·
knowledge and my review of the nomination papers	* * *
allegations stated upon my information and belief, I	
Dated this day of June, 2018.	
Dated this day of June, 2016.	
	Respectfully submitted
	De Aggant
	Douglas Hyant
State of Wisconsin	A TOUR DESIGNATION OF THE PARTY
County of <u>Pane</u>	WINN W. JUNIO
Subscribed and sworn to before me on	ST. OTA
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CERTIFICATE	OF SERVICE
I,, hereby certify that on the	day of June. 2018, a true and correct
copy of this complaint was forwarded via electron	
Wisconsin Elections Commission for Respondent, [[CHALLENGED CANDIDATE]].
	Signature of Challenger

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Candidate's name (required); no titles may be used. Ahna Key	Street, fire, or rural route number; box number (if rural route number) and Street. St	Candidate's residential address (required) <i>No P.O. box addresses</i> Street, fire, or rural route number; box number (if rural route); and name of street or road 205 N Michigan St	Gandidate's municipality for voting purposes (required). Town of purliage of Prairie Du Chien Garage of municipality)	u Chien
andidate's mailing address, including municipality for mailing purposes (required if lifferent than residential address or voting municipality)	rposes (required if State (required) Zip code 53821	Type of election (required) general special 71/(General Election date (Required) Name of Party or Statem (required) MO/Day/Year (5 words or less) 11/06/2018 Republican Party	Required) Name of Party or Statement of Principle (5 words or less) Republican Party
State Assembly	District or Jurisdiction (required if applicable) District number 96 District number 96 District number 96	red (f applicable) Name of j	Name of jurisdiction or district in which candidate seeks office (required) District 96	ïce (required)
the undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as a candidate representing the party on a terment of principle indicated above, so that voters will have the opportunity to vote for 🗆 him or 🖪 her for the office listed above. I am eligible to vote in the jurisdiction or district in which the notice and the normal section.	e name and residential address are listed above will have the opportunity to vote for □ him ed the nomination paper of any other candidations.	e, be placed on the ballot at the election desc or (a) her for the office listed above. I am eligit te for the same office at this election.	ibed above as a candidate representir le to vote in the jurisdiction or district	ng the party or in which the
he municipality used for mailing purposes, when different than municipality of residence, is not sufficient.	vhen different than municipality of reside		The name of the municipality of residence must always be listed	ays be listed.
ignatures of Electors	Printed Name of Electors	Residential Address (No P.O. Box Addresses) Street and Number or Rural Route (Rural address must also include box or fire no)		Date of Signing Mo/Day/Year
1. Michael Mara	Michael Mara	960 S Beaumont Rd	D Town Pr	5/14/18
2. Bradley Kabu	Beech Kapel	722 N Berumont Rd	a Drawn Pro I rie dry	5/14/10
a CMDD Wrenz	Chine Lorenz	36531 Wildling The Pity		5/14/18
" House of his	PATRICK LORENT	36538 WILDER NEST RO	15	81.41.5
5. Kris Calles	Kristine A Oehler	1534 S. 1445.	O Town Frairie du Village Chien, WI	5.15.18
s. ()ally (bulling)	Cali Collins	204 N MICHIGAN		5/15/18
TARMEN bach	Darci Achenbach	Stopp Swatch Rider Rd	<u> </u>	5-15-13
Bracky Powers	Bracky Powers	2197 E. Bruson St.		5-15-18
3. Jane Plus	5	2197 E. BrunsonSt.	Telly Chilen, WZ	81-51-5
10. Khawagockson	Shauna Jackson	214 N. Wacouta Avc.	Jacky Chica	05/15/18
(Name of circulator)	CERTIFICATIO	CERTIFICATION OF CIRCULATOR Tify: reside at36535	The number, street, and municipality)	du Chein, WI

further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally irculated this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate. I am ware that falsifying this certification is punishable under Wis. Stat. § 12.13(3)(a).

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15,2018 (Date)

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Ahna Key different than residential address or voting municipality) Candidate's mailing address, including municipality for mailing purposes (required if N Michigan St State Assembly State (required) M ☐ District number 96
☐ Jurisdiction (county) District or Jurisdiction (required if applicable Street, fire, or rural route number; box number (if rural route); and name of street or road N Michigan St Type of election (required) special general Name of jurisdiction or district in which candidate seeks office (required) 11/06/2018 istrict 96 (required) Mo/Day/Year General Election date Candidate's municipality for voting purposes (required)

Town of

Village of

Ricity of Republican Party (5 words or less) (Required) Name of Party or Statement of Principle Prairie Du Chien

the undersigned, request that the candidate, whose name and residential address are listed above, be placed on the ballot at the election described above as a candidate representing the party or atement of principle indicated above, so that voters will have the opportunity to vote for him or her for the office listed above. I am eligible to vote in the jurisdiction or district in which the indidate named above seeks office. I have not signed the nomination paper of any other candidate for the same office at this election

Signatures of Electors 10. The municipality used for mailing purposes, when different than municipality of residence, is not sufficient. The name of the municipality of residence must always be listed nawageckson Manual Manual Owers **Printed Name of Electors** Shouna Jackson Aristine Uran Bracky かんしん つらんととり Mara 20202 2N 07 C 2012 Shoth Sunder " 2197 E. Bruson 202 36538 WILDERNEST RO 214 N. Walcouth Ave 1534 S. 14x St 2190 E. BrunsonSt. Street and Number or Rural Route Residential Address (No P.O. Box Addresses) 200 (Rural address must also include box or fire no) 36538 722 N Secument \geq S Beaumont Rd MIND TRADERY CHECK マスラ Grown Prairie Uvilage Sell Scity (Mien) C Town Village Michy Chich □ Village I □ Town
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certify: I reside at Cheir, WIT

further certify I am either a qualified elector of Wisconsin, or a U.S. citizen, age 18 or older who, if I were a resident of this state, would not be disqualified from voting under Wis. Stat. § 6.03. I personally included this nomination paper and personally obtained each of the signatures on this paper. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signers are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent. I know that the signer are electors of the jurisdiction or district the candidate seeks to represent a section of the signer are electors of the jurisdiction or district the candidate seeks to represent a section of the signer are electors of the jurisdiction or district the candidate seeks to represent a section of the signer are electors of the jurisdiction or district the signer are electors of the juri

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Prairie Du Chien

General Election date (5 words or less) (Required) Name of Party or Statement of Principle

(required) Mo/Day/Year 1/06/2018

Name of jurisdiction or district in which candidate seeks office (required Republican Party

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O City O Villago O Town □ Town □ Village name of your municipality for Check the type and write the Mo/Day/Year Date of Signing 5/31/2018 5-2/-が変 131/2018 21-12 À

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certify: I reside at

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Wisconsin Circuit Court Access

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Crawford County Case Number 2016CF000042 State of Wisconsin vs. Bradley James Kober

The defendant Bradley James Kober was found guilty of the following charge(s) in this case.

Burglary-Ship or Vessel [Modifiers: Party to a Crime], a class F felony, Wisconsin Statutes 943.10(1m)(c).

applicant on the basis of a conviction only if the circumstances of the conviction substantially relate to the particular job. For more information, see Wisconsin Statute 111.335 and the Department of Workforce Development's publication, Arrest and Conviction Records under the Law. Notice to employers: It may be a violation of state law to discriminate against a job applicant because of an arrest or conviction record. Generally speaking, an employer may refuse to hire an

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Wisconsin Circuit Court Access

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Crawford County Case Number 2009CF000010 State of Wisconsin vs. Henry D. Langdon

The defendant Henry D. Langdon was found guilty of the following charge(s) in this case.

Possess Short-barreled Shotgun/Rifle, a class H felony, Wisconsin Statutes 941.28(2)

applicant on the basis of a conviction only if the circumstances of the conviction substantially relate to the particular job. For more information, see Wisconsin Statute 111.335 and the Department of Notice to employers: It may be a violation of state law to discriminate against a job applicant because of an arrest or conviction record. Generally speaking, an employer may refuse to hire an Workforce Development's publication, Arrest and Conviction Records under the Law

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Candidate's municipality for voting purposes (required Prairie Du Chien

(Required) Name of Party or Statement of Principle name of municipality

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District number 96

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CERTIFICATION OF CIRCULATOR TYPING

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(Signature of circulator)

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